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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEROY BACA,

Defendant.

No. CR 16-0066

STIPULATION TO CONTINUE SENTENCING

CURRENT SENTENCING DATE:
May 16, 2016 at 11:00 a.m.

PROPOSED SENTENCING DATE:
June 13, 2016 at 11:00 a.m.

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorneys Brandon D. Fox, Lizabeth A. Rhodes, and Eddie A. Jauregui, and defendant Leroy Baca, by and through his counsel of record, Michael Zweiback, hereby stipulate and request as follows:

1 1. Defendant made his initial appearance on the information in
2 this case and pled guilty pursuant to a Rule 11(c)(1)(C) agreement on
3 February 10, 2016. Defendant's Pre-Sentence Investigation Report was
4 filed on April 8, 2016.

5 2. On or about April 14, 2016, defendant provided the
6 government with documents relating to paragraph 65 of the Pre-
7 Sentence Investigation Report that may be relevant to the
8 government's sentencing recommendation, as well as the Court's
9 decision on whether to accept defendant's guilty plea pursuant to the
10 Rule 11(c)(1)(C) agreement.

11 3. The government wishes to conduct additional research
12 regarding the material disclosed by the defendant and referenced in
13 the Pre-Sentence Investigation Report.

14 4. Additionally, the lead attorney in this matter is scheduled
15 for trial in United States v. Brunsting, CR No. 13-573(A)-GW, which
16 is currently set for May 10, 2016. (On April 18, 2016, defense
17 counsel in that case filed an application to continue the trial date,
18 but the government opposes a continuance and the Court has not ruled
19 on it.)

20 5. To allow the government ample opportunity to prepare for
21 defendant's sentencing and file its recommendation with the Court,
22 the parties request that the sentencing of defendant be continued
23 until June 13, 2016. This would allow the parties to file their
24 sentencing papers by June 1, 2016.

25 6. Defendant is on bond and will not be prejudiced by a
26 continuance.

1 IT IS SO STIPULATED.

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3 Dated: April 20, 2016

EILEEN M. DECKER
United States Attorney

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5 LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

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7 /s/ Brandon Fox
BRANDON D. FOX
Assistant United States Attorney

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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

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12 Dated: April 20, 2016

13 /s/ Michael Zweiback
MICHAEL ZWEIBACK
Attorney for Defendant
14 LEROY BACA
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